IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant:	Houghton, et al.)	Examiner: Miller, Alan S.
Serial No.:	10/810,012)	Art Unit: 4137
Filing Date:	March 26, 2004)	Atty. Docket No. 040150

Title: TRACKING ACCOUNT STRUCTURE TO SUPPORT DIFFERENT LEVERAGE

LEVELS WITHIN AN INVESTMENT FUND

<u>AMENDMENT</u>

K&L Gates LLP Pittsburgh, PA 15222 September 9, 2008

VIA ELECTRONIC FILING

Mail Stop Amendment Commissioner for Patents Box 1450 Alexandria, VA 22313-1450

Dear Sir:

In response to the Office Action mailed April 1, 2008 ("the Office Action"), please amend the above-identified application as follows, wherein:

Amendments to the Claims begin on page 2; and

Remarks begin on page 13.